

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street, SW
Washington, DC 20554

October 1, 2007

Subject: Petition for Exemption from Closed Caption Requirements

Pursuant to 47 CFR § 79.1(f), Grace Baptist Church in Knox County, Tennessee hereby petitions the Federal Communications Commission for an exemption from the rules implementing closed caption on the grounds of undue burden.

Grace Baptist Church was organized and established in Knox County in December 1916, to provide a place for the community to worship God and study the Bible in the Baptist faith. In 1999 as part of its community outreach efforts Grace Baptist established a television program, *The Miracle of Grace*. This one hour program provides worship and Bible study opportunities for those who are unable to attend congregational worship each Sunday morning at the Grace Baptist Church location. It also provides an opportunity for unchurched people in the surrounding community to learn about Bible teachings and witness the worship experience from the privacy of their home. This television program is produced in-house with a large staff of volunteers and a small (3) in-house media staff.

For the reasons set forth below, Grace Baptist Church of Know County, hereby requests an undue burden exemption from the closed captioning rules for the *Miracle of Grace* television program, pursuant to 47 CFR § 79.1(f).

Financial Impact on the Program Provider

We have made inquiries into the cost of adding closed captioning to our television program. Adding closed captioning will require no new hardware but will require the purchase of specialty software. This software cost about \$8,000. In addition, adding closed captioning to our one hour program will require about 20 hours of labor per week. This labor is not currently available in-house and will require the hiring of one part-time person and outsourcing the labor to a production company.

Grace Baptist is a tax-exempt non-profit corporation. The only source of income is from donations of its members. All production costs are borne by Grace Baptist from the donations of its members. Grace Baptist has no other source of revenue. In addition to the television program Grace Baptist operates numerous other activities for the benefit of the local community. The needs of the community are many and the donations of the members do not meet all the needs. Consequently, Grace Baptist can not fund every identified worthy activity. Funding the closed captioning requirement will have a negative financial impact on existing programs. Grace Baptist considers this an "undue burden" and hereby petitions for an exemption.

If additional information is required please contact me at the address below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Stauder", written in a cursive style.

Rick Stauder
Director of Media Ministries
7171 Oak Ridge Highway
Knoxville, TN 37931
865-691-8886


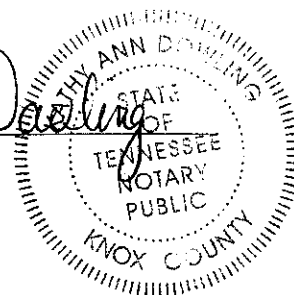
AFFIDAVIT

I, Rick Stauder, being first duly sworn, verify under oath that I am the Director of Media Ministries at Grace Baptist Church of Knox County, Tennessee and prepared the material in the attached letter and swear that it is true and correct to the best of my knowledge and belief.



Rick Stauder

Subscribed and sworn to before me the undersigned notary public on this 2nd day of October, 2007.


[Type name]
Notary Public

My commission expires on _____ MY COMMISSION EXPIRES:
October 11, 2008